

Message

From: Trakis, Lisa [Trakis.Lisa@epa.gov]
Sent: 9/24/2020 7:10:24 PM
To: Pratt, Stacie [Pratt.Stacie@epa.gov]; Harsh, Chad [Harsh.Chad@epa.gov]; Pruzinsky, Amanda [Pruzinsky.Amanda@epa.gov]
Subject: FW: NPDES SNC NCI - FY 2020 Q3 SNC Top 200 Lists by Region
Attachments: Region 1.xlsx; Region 2.xlsx; Region 3.xlsx; Region 4.xlsx; Region 5.xlsx; Region 6.xlsx; Region 7.xlsx; Region 8.xlsx; Region 9.xlsx; Region 10.xlsx

From: Palmer, Daniel

Sent: Thursday, July 09, 2020 4:54 PM

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Subject: NPDES SNC NCI - FY 2020 Q3 SNC Top 200 Lists by Region

NPDES Enforcement Branch Chiefs and other NPDES enforcement personnel,

Attached are the third round of quarterly, prioritized SNC lists based on the official FY 2020 Q2 SNC data. These lists are developed by the SNC NCI Steering Committee using the ECHO "SNC Tracker" tool which prioritizes SNCs based on the # of quarters of SNC (40%), the total amount of pollution discharged over limit (40%), and the toxic weighted amount of pollutants discharged over limit (20%). The lists are provided to you: 1) to assist in prioritizing SNCs for discussion with the authorized states at the quarterly meetings; and 2) for targeting purposes (especially for direct implementation).

Note: five new columns of information on the prioritized SNCs have been added to the spreadsheet and are highlighted in yellow. These columns represent new parameters that have been recently added to the SNC Tracker. These new parameters add flags for or information on:

- 1) Federal facilities
- 2) Facilities located within 15 miles of a drinking water source
- 3) Facilities discharging to an impaired water body—and if the water body is impaired,
- 4) What the causes of impairment are
- 5) What NPDES parameters the facility discharges that may potentially contribute to that water body's impairment.

As we have discussed, these SNC lists are intended to assure the Regions have a common starting point for identifying priority SNCs, while recognizing that there are other and sometimes better sources of information on permittees with serious violations. The lists are intended to assist, not limit the Regions in determining the most serious SNCs for attention.

As you may know, we have added the SNC Tracker's prioritizing function to SNC Early Warning Dashboard. This allows you to generate this same prioritized list from the Early Warning Dashboard – but you can also generate a prioritized SNC list based on the unofficial quarter's SNCs and based on real-time SNCs from the present quarter. This gives you the option of discussing a more recent set of SMNCs with your states and potentially intervening with these permittees early enough to prevent them from becoming "official" SNCs.

As we have said before, we want to make these SNC lists useful to you. Please let us know what does and does not work about these lists for your region so we may improve them!

Thank you.

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